



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

July 7, 2022

VIA ECF

Hon. John G. Koeltl  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: *Xuhui Tang v. Mayorkas, et al.*, 22 Civ. 2955 (JGK)

Dear Judge Koeltl:

This Office represents the government in this action in which the petitioner seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate a Refugee/Asylee Relative Petition (Form I-730). I write respectfully to request that the Court extend the deadline for the government to respond to the petition for a writ of mandamus from July 12, 2022, until August 19, 2022, and adjourn the initial pretrial conference presently scheduled for July 19, 2022, to a date after the government’s response to the petition is due, *i.e.*, during the week of August 29, 2022, or thereafter (with a corresponding extension of time for the preconference submission). See ECF No. 2.

The reason for the request is that although the petition was filed on April 10, 2022, the government was just recently served with the petition on June 17, 2022. As such, the government needs additional time to analyze the allegations in the petition and its response to those allegations. This is the government’s first request for an extension of the deadline to respond to the petition and first request for an adjournment of the initial pretrial conference. The petitioner consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/ Jacqueline Roman  
JACQUELINE ROMAN  
Special Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (347) 714-3363  
E-mail: jacqueline.roman@usdoj.gov  
*Attorney for Respondents*

cc: Counsel of record (via ECF)